

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DERRICK PETROLEUM SERVICES,
PLAINTIFF,

V.

PLS, INC.
DEFENDANT.

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CIVIL ACTION NO. 4:14-CV-01520
JURY DEMANDED

SUMMARY OF TESTIMONY OF NAVEEN SEETHARAMA

PLS, Inc. offers the testimony of Naveen Seetharama to support the fact that when he joined Derrick Petroleum Services, there were very few employees. Mr. Seetharama was among the first and had very little experience in analyzing oil and gas E&P transactions. Because Mr. Seetharama did not have much experience he traveled to the offices of PLS here in Houston for training. PLS voluntarily taught him the M&A database business. Brian Lidsky was his tutor. Mr. Seetharama knew that he needed to learn how to do sub-regional classifications in the database and make various other changes for the US and North American market.

Mr. Seetharama also learned other things from Mr. Lidsky such as how to value the dollar per acre metric. Mr. Seetharama even prepared an excel spreadsheet outlining all of the work that he performed in connection with Mr. Lidsky. The experience was summarized by Mr. Seetharama, but the database was changed dramatically after all these efforts. Among other things, Mr. Seetharama said the software experience is different. Quite frankly, it's a different platform, there are new categories of information and the database now includes midstream oil and gas data, oilfield services data, downstream data, and makes the database experience different. This happened because of the contribution by PLS.

Respectfully submitted,

HIRSCH & WESTHEIMER, P.C.

By: /s/Eric Lipper

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**ATTORNEYS FOR DEFENDANT,
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CERTIFICATE OF SERVICE

I do hereby certify that on this November 7, 2014, I electronically filed the foregoing with the Clerk of Court using the ECF system which sent notification of such filing to the following:

Brendan D. Cook
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Via Facsimile No. 713-427-5099

By: /s/Eric Lipper

Eric Lipper